
UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

LEE ABT, ESQUIRE

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ATTORNEY FOR DEBTOR
(LA 5525)

In re:

**BRYAN A. ADAMS
AND SHEILA K. HARRIS-ADAMS,**

Debtor.

Case No. 22-16468-ABA

Judge: Andrew B. Altenburg, Jr.

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

___ CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

XX TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (choose one):

1. ___ Motion for Relief from the Automatic Stay filed by ___, creditor. A hearing has been scheduled for ___ at 10:00 AM.

OR

___ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for ___ at ___ AM.

___ Certification of Default filed by ___, creditor.

I am requesting a hearing be scheduled on this matter.

XXX Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons:

_____ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

XXX Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer): We have just made two TFS payments to fully cure our Chapter 13 plan payments to the trustee. We had some difficulty when I was injured and had to miss some work time. However, we are now back on track. On 4/18/25 I initiated a TFS payment of \$633 under transaction ID# 18484304 that is to clear by 4/29/25. On 4/24/25 I initiated another TFS payment of \$610 under transaction ID# 18502312 that is to clear by 5/2/25. These two payments cure all plan arrears with the trustee through April 2025. We will resume regular monthly plan payments in May 2025. Upon the cure of the plan arrears, we request that the trustee withdraw the Trustee Certification of Default. We remain highly motivated to successfully complete our plan.

_____ Other (explain your answer): N/A

3. This certification is being made in an effort to resolve the issues raised by the creditor or trustee.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 4/22/25

/s/ Sheila K. Harris-Adams

SHEILA K. HARRIS-ADAMS, DEBTOR

Note:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a *Creditor's Certification of Default (under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions)* or a *Trustee's Certification of Default*.

If this form is not filed the Motion of Certification of Default will be deemed uncontested and no hearing will be scheduled.